

Exhibit B

Proposed Temporary Restraining Order and Other Orders

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY; BEASLEY
LAW GROUP PC; JEFFREY J. JUDD;
CHRISTOPHER R. HUMPHRIES; J&J
CONSULTING SERVICES, INC., an Alaska
Corporation; J&J CONSULTING SERVICE,
INC., a Nevada Corporation; J AND J
PURCHASIN LLC; SHANE M. JAGER;
JASON M. JONGEWARD; DENNY
SEYBERT; and ROLAND TANNER;

Defendants;

THE JUDD IRREVOCABLE TRUST; PAJ
CONSULTING INC; BJ HOLDINGS LLC;
STIRLING CONSULTING, L.L.C.; CJ
INVESTMENTS, LLC; JL2
INVESTMENTS, LLC; ROCKING HORSE
PROPERTIES, LLC; TRIPLE THREAT
BASKETBALL, LLC; ACAC LLC;
ANTHONY MICHAEL ALBERTO, JR.; and
MONTY CREW LLC;

Relief Defendants.

Case No.: 2:22-cv-00612

**[PROPOSED] TEMPORARY
RESTRAINING ORDER AND
ORDERS: (1) FREEZING ASSETS; (2)
REQUIRING ACCOUNTINGS; (3)
PROHIBITING THE DESTRUCTION
OF DOCUMENTS; AND (4)
GRANTING EXPEDITED
DISCOVERY; AND (5) ORDER TO
SHOW CAUSE RE PRELIMINARY
INJUNCTION**

1 This matter came before the Court upon Plaintiff Securities and Exchange Commission's
 2 *Ex Parte* Application for Temporary Restraining Order and Orders (1) Freezing Assets; (2)
 3 Requiring Accountings; (3) Prohibiting the Destruction of Documents; and (5) to Show Cause
 4 Re Preliminary Injunction (the "TRO Application").

5 The Court, having considered the Commission's Complaint, the TRO Application and
 6 supporting memorandum of points and authorities, the supporting declarations and exhibits, and
 7 the other evidence and argument presented to the Court, finds that:

- 8 A. This Court has jurisdiction over the parties to, and the subject matter of, this
 9 action.
- 10 B. The Commission has made a sufficient and proper showing in support of the relief
 11 granted herein, as required by Section 20(b) of the Securities Act of 1933
 12 ("Securities Act") [15 U.S.C. § 77t(b)] and Section 21(d) of the Securities
 13 Exchange Act of 1934 ("Exchange Act") [15 U.S.C. § 78u(b)], by evidence
 14 establishing a *prima facie* case and likelihood that Defendants Matthew Wade
 15 Beasley, Christopher Ronn Humphries, Shane Michael Jager, Jason Myers
 16 Jongeward, Jeffrey Jason Judd, Denny Seybert, Roland Tanner, Beasley Law
 17 Group PC, J&J Consulting Services, Inc. (Alaska), J&J Consulting Services, Inc.
 18 (Nevada), and J and J Purchasing LLC (collectively herein, "Defendants") have
 19 engaged in, are engaging in, are about to engage in, and will continue to engage
 20 in, unless restrained, transactions, acts, practices and courses of business that
 21 constitute violations of Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)];
 22 Section 10(b) of the Securities Exchange Act [15 U.S.C. § 78j(b)], and Rule 10b-
 23 5 thereunder [17 C.F.R. § 240.10b-5]; Section 5(a) and (c) of the Securities Act
 24 [15 U.S.C. § 77e(a), (c)]; and/or Section 15(a)(1) of the Exchange Act [15 U.S.C.
 25 § 78o(a)(1)].
- 26 C. Good cause exists to believe that, unless restrained and enjoined by order of this
 27 Court, Defendants, and Relief Defendants Anthony Michael Alberto, Jr., ACAC
 28 LLC, BJ Holdings LLC, CJ Investments LLC, JL2 Investments, LLC, Monty

Crew LLC, PAJ Consulting Inc, Rocking Horse Properties LLC, Stirling Consulting L.L.C., The Judd Irrevocable Trust, and Triple Threat Basketball, LLC (collectively herein, "Relief Defendants"), will dissipate, conceal, or transfer assets which could be the subject to an order directing disgorgement or the payment of civil money penalties in this action. It is appropriate for the Court to issue this Temporary Restraining Order so that prompt service on appropriate financial institutions can be made, thus preventing the dissipation of assets.

D. Good cause exists to believe than an accounting of assets by each of the Defendants is necessary.

E. Good cause exists to believe that, unless restrained and enjoined by order of this Court, Defendants may alter or destroy documents relevant to this action.

F. Good cause exists to believe that expedited discovery is necessary.

I.

IT IS HEREBY ORDERED that the Commission's TRO Application is GRANTED.

II.

IT IS FURTHER ORDERED that Defendants and their officers, agents, servants, employees, attorneys, subsidiaries and affiliates, and those persons in active concert or participation with any of them, who receive actual notice of this Order, by personal service or otherwise, and each of them, be and hereby are temporarily restrained and enjoined from, directly or indirectly, in the offer or sale of any securities, by the use of any means or instruments of transportation or communication in interstate commerce or by use of the mails:

A. employing any device, scheme or artifice to defraud;

B. obtaining money or property by means of any untrue statement of a material fact or any omission of a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading;
or

C. engaging in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon the purchaser

1 in violation of Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)].

2 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in
3 Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who
4 receive actual notice of this Order by personal service or otherwise: (a) Defendants' officers,
5 agents, servants, employees, and attorneys; and (b) other persons in active concert or
6 participation with Defendants or with anyone described in (a).

7 III.

8 IT IS FURTHER ORDERED that Defendants and their officers, agents, servants,
9 employees, attorneys, subsidiaries and affiliates, and those persons in active concert or
10 participation with any of them, who receive actual notice of this Order, by personal service or
11 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,
12 directly or indirectly, in connection with the purchase or sale of any security, by use of any
13 means or instrumentality of interstate commerce, or of the mails, or of any facility of any
14 national securities exchange:

- 15 A. employing any device, scheme or artifice to defraud
- 16 B. making any untrue statement of a material fact or omitting to state a material fact
17 necessary in order to make the statements made, in the light of the circumstances
18 under which they were made, not misleading; or
- 19 C. engaging in any act, practice, or course of business which operates or would
20 operate as a fraud or deceit on upon any person

21 in violation of Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)], and Rule 10b-5
22 thereunder [17 C.F.R. § 240.10b-5].

23 IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure
24 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this
25 Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees,
26 and attorneys; and (b) other persons in active concert or participation with Defendants or with
27 anyone described in (a).

28 IV.

1 IT IS FURTHER ORDERED that Defendants and their officers, agents, servants,
 2 employees, attorneys, subsidiaries and affiliates, and those persons in active concert or
 3 participation with any of them, who receive actual notice of this Order, by personal service or
 4 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,
 5 directly or indirectly, in the absence of any applicable exemption:

6 A. unless a registration statement is in effect as to a security, making use of any
 7 means or instruments of transportation or communication in interstate commerce
 8 or of the mails to sell such security through the use or medium of any prospectus
 9 or otherwise;

10 B. unless a registration statement is in effect as to a security, carrying or causing to
 11 be carried through the mails or in interstate commerce, by any means or
 12 instruments of transportation, any such security for the purpose of sale or for
 13 delivery after sale; or;

14 C. making use of any means or instruments of transportation or communication in
 15 interstate commerce or of the mails to offer to sell or offer to buy through the use
 16 or medium of any prospectus or otherwise any security, unless a registration
 17 statement has been filed with the Commission as to such security, or while the
 18 registration statement is the subject of a refusal order or stop order or (prior to the
 19 effective date of the registration statement) any public proceeding or examination
 20 under Section 8 of the Securities Act [15 U.S.C. § 77h].

21 in violation of Section 5 of the Securities Act [15 U.S.C. § 77e].

22 IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure
 23 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this
 24 Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees,
 25 and attorneys; and (b) other persons in active concert or participation with Defendants or with
 26 anyone described in (a).

27 V.
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1 IT IS FURTHER ORDERED that Defendants and their officers, agents, servants,
2 employees, attorneys, subsidiaries and affiliates, and those persons in active concert or
3 participation with any of them, who receive actual notice of this Order, by personal service or
4 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,
5 directly or indirectly, using any means or instrumentality of interstate commerce, or of the mails,
6 or of any facility of any national securities exchange, to effect transactions in, or induce or
7 attempt to induce the purchase or sale of, securities while not registered with the Commission as
8 a broker or dealer or while not associated with an entity registered with the Commission as a
9 broker or dealer in violation of Section 15(a)(1) of the Exchange Act [15 U.S.C. § 78o(a)(1)].

10 IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure
11 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this
12 Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees,
13 and attorneys; and (b) other persons in active concert or participation with Defendants or with
14 anyone described in (a).

15 VI.

16 IT IS FURTHER ORDERED that Defendants Matthew W. Beasley, Jeffrey J. Judd,
17 Beasley Law Group PC, J&J Consulting Services, Inc. (Alaska), J&J Consulting Services, Inc.
18 (Nevada), and J and J Purchasing LLC, and their officers, agents, servants, employees, attorneys,
19 subsidiaries and affiliates, and those persons in active concert or participation with any of them,
20 who receive actual notice of this Order, by personal service or otherwise, and each of them, be
21 and hereby are temporarily restrained and enjoined from, directly or indirectly, issuing,
22 purchasing, or selling any security related to settled litigation claims, except for the purchase or
23 sale of securities listed on a national securities exchange by these Defendants for their own
24 personal accounts.

25 IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure
26 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this
27 Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees,
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1 and attorneys; and (b) other persons in active concert or participation with Defendants or with
2 anyone described in (a).

3 **VII.**

4 IT IS FURTHER ORDERED that Defendants Christopher R. Humphries, Shane M.
5 Jager, Jason M. Jongeward, Denny Seybert, and Roland Tanner, and their officers, agents,
6 servants, employees, attorneys, subsidiaries and affiliates, and those persons in active concert or
7 participation with any of them, who receive actual notice of this Order, by personal service or
8 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,
9 directly or indirectly, soliciting any person or entity to purchase or sell any security.

10 IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure
11 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this
12 Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees,
13 and attorneys; and (b) other persons in active concert or participation with Defendants or with
14 anyone described in (a)

15 **VIII.**

16 IT IS FURTHER ORDERED that, except as otherwise ordered by this Court,
17 Defendants, Relief Defendants, and Defendants' and Relief Defendants' officers, agents,
18 servants, employees, attorneys, subsidiaries and affiliates, and those persons in active concert or
19 participation with any of them, who receive actual notice of this Order, by personal service or
20 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,
21 directly or indirectly, transferring, assigning, selling, hypothecating, changing, wasting,
22 dissipating, converting, concealing, encumbering, or otherwise disposing of, in any manner, any
23 funds, assets, securities, claims or other real or personal property, including any notes or deeds of
24 trust or other interest in real property, wherever located, of any one of the Defendants or Relief
25 Defendants, or their subsidiaries or affiliates, owned by, controlled by, managed by or in the
26 possession or custody of any of them and from transferring, encumbering, dissipating, incurring
27 charges or cash advances on any debit or credit card of the credit arrangement of any one of the
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Defendants or their subsidiaries and affiliates; including but not limited to the real and personal property below:

Real Property

Property Address	Owner
9 Sky Arc Court, Henderson, Nevada 89012 APN: 178-33-610-039	The Judd Irrevocable Trust
8 Twisted Rock Court, Nevada 89012 APN: 178-33-510-037	The Judd Irrevocable Trust
7329 Ravines Avenue, Las Vegas Nevada 89131 APN: 125-10-115-020	The Judd Irrevocable Trust
599 N. Red Mountain Court, Heber City, Utah 84032 APN: 00-0021 -0348	The Judd Irrevocable Trust
2314 E. La Sal Peak Drive, Heber City, Utah 84032 APN: 00-0021-1113	The Judd Irrevocable Trust
19 Sky Arc Court, Henderson, Nevada 89012 APN: 178-33-210-004	Jager Trust
29 Rockstream Drive, Henderson, Nevada 89012 APN: 178-33-213-010	Jager Trust
16 Paradise Valley Court, Henderson, Nevada 89052 APN: 190-08-612-003	Jager Trust

Property Address	Owner
2394 E. La Sal Peak Drive, Heber City, Utah 84032 APN: 00-0021-1104	Jager Trust
2364 E. La Sal Peak Dr., Heber City, Utah 84032 APN: 00-0021-1105	Jager Trust
4015 Calle Lisa, San Clemente, California 92672 APN: 060-231-23	Jager Trust
5475 Ruffian Road, Las Vegas, Nevada 89149 APN: 126-36-501-029	Matthew and Paula Beasley
5485 Ruffian Rd. Las Vegas, Nevada 89149 APN: 126-36-501-030	Matthew and Paula Beasley
Real property located at the corner of W. Stephen Ave. & Ruffian Rd., Las Vegas, Nevada 89149 APN: 126-36-501-031	Matthew and Paula Beasley
Real property located at the corner of W. Hammer Ln. & Ruffian Rd., Las Vegas, Nevada 89149 APN: 126-36-501-017	Matthew and Paula Beasley
2143 Via Regina Coeli Street, Mt. Charleston, Nevada 89124 APN: 129-02-410-074	Matthew and Paula Beasley

Personal Property

2021 Bentley GT convertible
2020 Rolls Royce Dawn
2022 Rolls Royce Cullinan
2019 Ferrari 812 Superfast
Hawker 900XP private jet
2021 Bentley Continental
2020 Bentley Continental
2020 Mercedes Benz G63 AMG
Two 2020 Porsche Taycans
2020 Ashton Martin Vantage
2018 Porsche 911
2020 Porsche Cayenne
2019 Cadillac Escalade
2019 Lexus LX
2017 Chevrolet Corvette Z06
2018 Land Rover Range Rover
2018 Chevrolet Camaro
2018 Mercedes Benz E43 AMG
2019 Toyota 4Runner
RVs of unknown year, make and model
ATVs of unknown year, make and model
Boats of unknown year, make and model

IX.

IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, an immediate freeze shall be placed on all monies and assets (with an allowance for necessary and reasonable living expenses to be granted only upon good cause shown by application to the Court with notice to and an opportunity for the Commission to be heard) in all accounts at any

bank, financial institution or brokerage firm, or third-payment payment processor, all certificates of deposit, and other funds or assets, held in the name of, for the benefit of, or over which account authority is held by Defendants and Relief Defendants, including but not limited to the accounts listed below:

BROKERAGE / BANK NAME	ACCOUNT NAME	ACCOUNT NUMBER
Wells Fargo	Beasley Law Group PC	XXXXXXX5580
Bank of Nevada	Beasley Law Group PC (NV IOLTA Acct)	XXXXXXX5598
Wells Fargo	Beasley Law Group PC (NV IOLTA Acct)	XXXXXXX8898
Wells Fargo	Bugraiders Pest Control, LLC	XXXXXXX0377
Wells Fargo	Bugraiders Pest Control, LLC	XXXXXXX9745
Wells Fargo	CJ Investments LLC	XXXXXXX6358
Wells Fargo	Jessica A Humphries & Christopher R Humphries	XXXXXXX0836
Wells Fargo	Jessica A Humphries & Christopher R Humphries	XXXXXXX2164
Wells Fargo	Jessica A Humphries & Christopher R Humphries	XXXXXXX5547
Wells Fargo	J & J Consulting	XXXXXXX0153
Wells Fargo	Nevada Pro Pest Control Inc.; dba Nevada Pest Control; dba Pigeons Be Gone	XXXXXXX6540
Wells Fargo	Stirling Consulting LLC	XXXXXXX6558
Wells Fargo	Shane Jager	XXXXXXX09335

BROKERAGE / BANK NAME	ACCOUNT NAME	ACCOUNT NUMBER
Wells Fargo	Nevada Pro Pest Control Inc.; dba Nevada Pest Control; dba Pigeons Be Gone	XXXXXXX1189
Wells Fargo	Triple Threat Basketball, LLC	XXXXXXX2948
Wells Fargo	Triple Threat Basketball, LLC	XXXXXXX9671
Wells Fargo	Triple Threat Basketball, LLC	XXXXXXX2643
Wells Fargo	Triple Threat Basketball, LLC (savings)	XXXXXXX3578
US Bank	Judd Nevada Trust; Jeffrey J Judd Trustee; Jennifer R Judd Trustee	XXXXXXXXXX0331
US Bank	Jeffrey Judd	XXXXXXXXXX4223
US Bank	Jeffrey Judd	XXXXXXXXXX4207
US Bank	CJ Investments LLC	XXXXXXXXXX0526
US Bank	Target Marketing Insurance Services Inc	XXXXXXXXXX0841
US Bank	The CJ Humphries Foundation	XXXXXXXXXX0913
US Bank	Christopher Ronn Humphries; Jessica Allison Humphries	XXXXXXXXXX1591
US Bank	J&J Consulting Services, Inc	XXXXXXXXXX2073

BROKERAGE / BANK NAME	ACCOUNT NAME	ACCOUNT NUMBER
US Bank	Target Managers Insurance Services Inc	XXXXXXXXX3156
US Bank	The Judd Family Foundation	XXXXXXXXX3495
US Bank	Matthew W Beasley; Paula C Beasley; Matthew Beasley	XXXXXXXXX4338
US Bank	Jeffrey J Judd Tstee/Grnt; Judd Family Trust; Jennifer R Judd Trustee	XXXXXXXXX5473
US Bank	Jeffrey J Judd Tstee/Grnt; Judd Family Trust; Jennifer R Judd Trustee	XXXXXXXXX6245
US Bank	Matthew W Beasley; Paula C Beasley; Matthew Beasley	XXXXXXXXX7143
US Bank	Christopher Ronn Humphries; Jessica Allison Humphries	XXXXXXXXX8067
US Bank	Judd Nevada Trust; Jeffrey J Judd Trustee; Jennifer R Judd Trustee	XXXXXXXXX3033
US Bank	Expert Litigation Services Inc	XXXXXX9682
US Bank	PAJ Consulting Inc	XXXXXXXXX3503
US Bank	Priscilla Rosegreen; Warren Rosegreen	XXXXXXXXX4389
US Bank	Priscilla Rosegreen; Warren Rosegreen	XXXXXXXXX9713
US Bank	BJ Holdings LLC	XXXXXXXXX0010

BROKERAGE / BANK NAME	ACCOUNT NAME	ACCOUNT NUMBER
Citibank	Warren Rosegreen	XXXXXXXX2878

Any bank, financial institution or brokerage firm, or third-party payment processor holding such monies or assets described above shall hold and retain within their control and prohibit the withdrawal, removal, transfer or other disposal of any such funds or other assets except as otherwise ordered by this Court.

X.

IT IS FURTHER ORDERED that Defendants, within five days of the issuance of this Order, shall prepare and deliver to the Commission a detailed and complete schedule of all of their personal assets, including all real and personal property exceeding \$5,000 in value, and all bank, securities, and other accounts identified by institution, branch address and account number. The accounting shall include a description of the sources of all such assets. Such accounting shall be simultaneously filed with the Court and a copy shall be delivered to the Commission to the attention of Tracy S. Combs, counsel for the Commission, by electronic mail at combst@sec.gov. After completion of the accounting, each of the Defendants shall produce to the Commission, at a time agreeable to the Commission, all books, records and other documents supporting or underlying their accounting.

XI.

IT IS FURTHER ORDERED that any person who receives actual notice of this Order by personal service or otherwise, and who holds, possesses or controls assets exceeding \$5,000 for the account or benefit of any one of the Defendants, shall within 5 days of receiving actual notice of this Order provide counsel for the Commission with a written statement identifying all such assets, the value of such assets, or best approximation thereof, and any account numbers or account names in which the assets are held.

XII.

1 IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, each of the
2 Defendants, and their officers, agents, servants, employees, attorneys, subsidiaries and affiliates,
3 and those persons in active concert or participation with any of them, who receive actual notice
4 of this Order, by personal service or otherwise, and each of them, be and hereby are temporarily
5 restrained and enjoined from, directly or indirectly: destroying, mutilating, concealing,
6 transferring, altering, or otherwise disposing of, in any manner, any documents, which includes
7 all books, records, computer programs, computer files, computer printouts, contracts, emails,
8 correspondence, memoranda, brochures, or any other documents of any kind in their possession,
9 custody or control, however created, produced, or stored (manually, mechanically, electronically,
10 or otherwise) pertaining in any manner to Defendants or to the allegations alleged in the
11 Commission's complaint.

12 XIII.

13 IT IS FURTHER ORDERED that the Commission's application for expedited discovery
14 concerning Defendants and their assets and activities is granted and that, commencing with the
15 time and date of this Order, in lieu of the time periods, notice provisions, and other requirements
16 of Rules 26, 30, 33, 34, 36, and 45 of the Federal Rules of Civil Procedure and the corresponding
17 Local Rules of this Court, discovery shall proceed as follows:

- 18 A. Pursuant to Rule 30(a) of the Federal Rules of Civil Procedure, the Commission
19 may take video depositions of parties or any third parties upon oral examination
20 on two days' notice of any such depositions. Depositions may be taken Monday
21 through Saturday. As to Defendants, and their agents, servants, promoters,
22 employees, brokers, associates, and any person who transferred money to or
23 received money from the bank accounts identified above, the Commission may
24 depose such witnesses after service a deposition notice by facsimile, electronic
25 mail, hand or overnight courier upon such individuals, and without serving a
26 subpoena on such witness. Depositions that have not been signed by the witness
27 may be used for purposes of the hearing on the SEC's application for preliminary
28 injunction;

1 B. Pursuant to Rule 45 and the applicable provisions in the Securities Act and
2 Exchange Act, each party may serve subpoenas to third parties; and

3 C. All discovery requests and responses may be served via email, facsimile, or by
4 hand on counsel for the parties.

5 **XIV.**

6 IT IS FURTHER ORDERED that the representatives of the Commission and any other
7 government agency are authorized to have continuing access to inspect or copy any or all of the
8 corporate books and records and other documents of Defendants and their subsidiaries and
9 affiliates, and continuing access to inspect their funds, property, assets and collateral, wherever
10 located.

11 **XV.**

12 IT IS FURTHER ORDERED that this Temporary Restraining Order shall expire on April
13 22, 2022 unless for good cause shown it is extended or the parties against whom it is directed
14 consent that it may be extended for a longer period.

15 **XVI.**

16 IT IS FURTHER ORDERED that on April 21, 2022 at 10:00 a.m., the Defendants, and
17 each of them, shall appear before the Honorable James C. Mahan, Judge of the United States
18 District Court of Nevada, for a hearing to show cause, if there be any, why a preliminary
19 injunction should not be granted. Any declarations, affidavits, points and authorities in
20 opposition to, the issuance of such an Order shall be filed with the Court and emailed to Tracy S.
21 Combs, counsel for the Commission, at combst@sec.gov, and the offices of the Defendants or
22 their attorneys no later than 4:00 p.m., on Tuesday, April 19, 2022.
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XVII.

IT IS FURTHER ORDERED that this Court shall retain jurisdiction over this action for the purpose of implementing and carrying out the terms of all orders and decrees which may be entered herein and to entertain any suitable application or motion for additional relief within the jurisdiction of this Court.

IT IS SO ORDERED.

Date: _____
Time: _____

JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE

Presented by:
Tracy S. Combs
Casey R. Fronk
Attorneys for Plaintiff
Securities and Exchange Commission